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*Attorneys for Defendants*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES  
LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard  
L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF JAMES HELLER, BARBARA H. FRIETAG,  
as personal representative and as an individual, STEVEN P.  
HELLER, as personal representative and as an individual,  
HARRY H. FALK, as personal representative, EVE  
FRIETAG, ELIZABETH FRIETAG DRANOFF, TRUST  
FBO AN.D. [a minor] UNDER ARTICLES SIXTH AND  
EIGHTH OF THE LAST WILL AND TESTAMENT OF  
JAMES HELLER, a New York trust, BARBARA H.  
FRIETAG, as trustee, TRUST FBO AL.D. [a minor] UNDER  
ARTICLES SIXTH AND EIGHTH OF THE LAST WILL  
AND TESTAMENT OF JAMES HELLER, a New York  
trust, BARBARA H. FRIETAG, as trustee, TRUST FBO S.H.  
[a minor] UNDER ARTICLES SIXTH AND EIGHTH OF  
THE LAST WILL AND TESTAMENT OF JAMES

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05061 (SMB)

HELLER, a New York trust, STEVEN P. HELLER, as trustee, TRUST FBO KATHERINE HELLER UNDER ARTICLES SIXTH AND EIGHTH OF THE LAST WILL AND TESTAMENT OF JAMES HELLER, a New York trust, STEVEN P. HELLER, as trustee, KATHERINE HELLER, and ELEANOR LEACOCK,

Defendants.

**NOTICE OF SUBSTITUTION OF COUNSEL AND ORDER**

PLEASE TAKE NOTICE that the law firm of Frejka PLLC, 733 Third Avenue, New York, New York 10017, shall be substituted in place of the law firm of Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, New York 10036 as counsel of record for Estate of James Heller, Barbara H. Freitag s/h/a Barbara H. Frietag, Steven P. Heller, Harry H. Falk, Eve Frietag, Elizabeth Frietag Dranoff, Trust FBO AN.D. [a minor] under Articles Sixth and Eighth of the Last Will and Testament of James Heller, Trust FBO AL.D. [a minor] under Articles Sixth and Eighth of the Last Will and Testament of James Heller, Trust FBO S.H. [a minor] under Articles Sixth and Eighth of the Last Will and Testament of James Heller, Steven P. Heller, Trust FBO Katherine Heller under Articles Sixth and Eighth of the Last Will and Testament of James Heller, Katherine Heller, and Eleanor Leacock (the “Defendants”) in this adversary proceeding. All notices given or required to be given in this adversary proceeding shall be given to and served upon the following:

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PLEASE TAKE FURTHER NOTICE THAT the Defendants have knowledge of and  
consent to this substitution of counsel.

Dated: New York, New York  
March 23, 2015

Dated: New York, New York  
March 23, 2015

KRAMER LEVIN NAFTALIS &  
FRANKEL LLP

FREJKA PLLC

By: /s/ Philip Bentley  
Philip Bentley  
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By: /s/ Elise S. Frejka  
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Telephone: (212) 641-0800

Dated: New York, New York  
March 23<sup>rd</sup>, 2015

SO ORDERED:

/s/ STUART M. BERNSTEIN  
HON. STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE